1	DANIEL G. BOGDEN	
2	United States Attorney	
3	District of Nevada BLAINE T. WELSH	
	Assistant United States Attorney	
4	Nevada Bar. No. 4790	
5	333 Las Vegas Blvd. South, Suite 5000 Las Vegas, Nevada 89101	
6	Phone: (702) 388-6336	
7	Facsimile: (702) 388-6787 Email: Blaine.Welsh@usdoj.gov	
	Email: Blame. Weishe asaoj.gov	
8	JONATHAN NUECHTERLEIN General Counsel	
9	NIKHIL SINGHVI	
10	JASON D. SCHALL	
11	HELEN P. WONG IOANA RUSU	
	LaSHAWN M. JOHNSON COURTNEY A. ESTEP Federal Trade Commission 600 Pennsylvania Avenue, NW	
12		
13		
14	Mailstop CC-10232	
15	Washington, D.C. 20580 Phone: (202) 326-3480 (Singhvi)	
	Facsimile: (202) 326-3768	
16	Email: nsinghvi@ftc.gov (Singhvi); jschall@ftc.gov (Sc	hall)
17	UNITED STATES DISTRICT COURT	
18	DISTRICT OF NEVADA	
19	FEDERAL TRADE COMMISSION,	
20		Case No. 2:12-cv-536-GMN-VCF
21	Plaintiff,	PLAINTIFF'S MOTION
	v.	TO STRIKE
22	AMC Carriago Ing at al	DEFENDANTS'
23	AMG Services, Inc. et al.,	AFFIRMATIVE DEFENSES PURSUANT
24	Defendants, and	TO RULE 12(f)(2)
25	Park 269 LLC, et al.,	
26	Relief Defendants.	
27	Kener Derendants.	

Plaintiff Federal Trade Commission ("FTC") respectfully moves the Court, pursuant to Rule 12(f)(2), to strike Defendants' affirmative defenses as follows:

- Troy LittleAxe's Answer (ECF No. 405), Affirmative Defenses Nos. 1-59;
- Kim C. Tucker's and Park 269, LLC's Answer (ECF No. 631), Affirmative Defenses Nos. 1-7¹;
- Scott A. Tucker; AMG Capital Management, LLC; Level 5 Motorsports, LLC; Blackcreek Capital Corporation; Broadmoor Capital Partners, LLC; LeadFlash Consulting, LLC; and Nereyda M. Tucker, as Executor of the Estate of Blaine A. Tucker Answer (ECF No. 645), Affirmative Defenses Nos. 1-12;
- Timothy Muir's and The Muir Law Firm, LLC's Answer (ECF No. 646), Affirmative Defenses Nos. 1-14;
- SFS, Inc.'s Answer (ECF No. 647), Affirmative Defenses Nos. 1-8;
- Red Cedar Services, Inc.'s Answer (ECF No. 648), Affirmative Defenses Nos. 1-8;
- Robert Campbell's Answer (ECF No. 649), Affirmative Defenses Nos. 1-13;
- Don Brady's Answer (ECF No. 650), Affirmative Defenses Nos. 1-5;
- AMG Services, Inc.'s Answer (ECF No. 651), Affirmative Defenses Nos. 1-8; and
- MNE Services, Inc.'s Answer (ECF No. 652), Affirmative Defenses 1-8.

The answer filed by Kim C. Tucker and Park 269, LLC (ECF No. 631) lists two separate "FIFTH" affirmative defenses and lists seven affirmative defenses altogether. The FTC moves to strike all seven of the affirmative defenses.

The accompanying memorandum of points and authorities demonstrates that all of Defendants' above-listed affirmative defenses are 1) redundant or immaterial to the issues of this case; 2) insufficient as a matter of law; and/or 3) not properly pleaded, and should thus be stricken.

Dated: August 21, 2014

Respectfully submitted,

/s/ Ioana Rusu
Nikhil Singhvi
Jason D. Schall
Helen P. Wong
Ioana Rusu
LaShawn M. Johnson
Courtney A. Estep

Attorneys for Plaintiff Federal Trade Commission 1

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CERTIFICATE OF SERVICE I, Ioana Rusu, certify that, as indicated below, all parties were served with **PLAINTIFF'S** MOTION TO STRIKE DEFENDANTS' AFFIRMATIVE DEFENSES PURSUANT **TO RULE 12(f)(2)** filed with the Court, as indicated below. Dated: August 21, 2014 /s/ Ioana Rusu Ioana Rusu **Via Electronic Case Filing:** Joshua M. Dickey (jdickey@baileykennedy.com) Attorney for Red Cedar Services, Inc. dba 500FastCash; SFS, Inc. dba OneClickCash Conly J. Schulte (cschulte@ndnlaw.com) Francis J. Nyhan (jnyhan@ndnlaw.com) Nicole Ducheneaux (nducheneaux@ndnlaw.com) Attorneys for Defendants AMG Services, Inc.; Red Cedar Services, Inc. dba 500FastCash; SFS, Inc. dba OneClickCash; MNE Services, Inc. dba Tribal Financial Services, Ameriloan, UnitedCashLoans, USFastCash David J. Merrill (david@djmerrillpc.com) Debra K. Lefler (debra.lefler@kirkland.com) Bradley Weidenhammer (bweidenhammer@kirkland.com) Charles Kalil (ckalil@kirkland.com) Richard Howell (rhowell@kirkland.com) Peter J. Wozniak (peter.wozniak@kirkland.com) Andrew A. Kassof (andrew.kassof@kirkland.com) Attorneys for Defendants AMG Services, Inc. and MNE Services, Inc. dba Tribal Financial Services, Ameriloan, UnitedCashLoans, USFastCash Von S. Heinz (vheinz@lrrlaw.com) Darren J. Lemieux (dlemieux@lrrlaw.com) E. Leif Reid (lreid@lrrlaw.com) Jeffrey D. Morris (jmorris@berkowitzoliver.com) Ryan C. Hudson (rhudson@berkowitzoliver.com) Nick J. Kurt (nkurt@berkowitzoliver.com) Attorneys for Defendants AMG Capital Management, LLC; Level 5 Motorsports, LLC; LeadFlash Consulting, LLC; Black Creek Capital Corporation; Broadmoor Capital Partners, LLC; Scott A. Tucker; Nereyda M. Tucker, as Executor of the Estate of Blaine A. Tucker

L. Christopher Rose (<u>lcr@juww.com</u>) Michael R. Ernst (mre@juww.com) Attorneys for Defendants The Muir Law Firm, LLC and Timothy J. Muir Jay Young (jay@h2law.com) Attorney for Defendant for Robert D. Campbell Paul C. Ray (paulcraylaw@aol.com) Alyssa D. Campbell (acampbell@laic-law.com) Attorneys for Defendant Troy L. Littleaxe Patrick J. Reilly (preilly@hollandhart.com) Linda C. McFee (lmcfee@mcdowellrice.com) Robert Peter Smith (petesmith@mcdowellrice.com) Attorneys for Relief Defendants Kim C. Tucker and Park 269 LLC Brian R. Reeve (breeve@swlaw.com) Nathan F. Garrett (ngarrett@gravesgarrett.com) Whitney P. Strack (pstrack@gravesgarrett.com) Attorneys for Defendant Don E. Brady